

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ERIC ROMERO DE LEON  
DEBTORS

CASE NO 13-06792-BKT  
CHAPTER 13

**DEBTORS' MOTION AND NOTICE OF FILING OF POST-CONFIRMATION  
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

**NOW COMES, ERIC ROMERO DE LEON**, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated May 19, 2015, herewith and attached to this motion.
2. This Plan modification is filed to increase the length of time from 18 months to 60 months in which the debtor will pay the proposed lump sum payment of \$18,000.00. The debtor needs to extend the time to pay the lump sum, because he has not received any proceeds from the claim for salary since the case is still pending.

**NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)**

**Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**

**I CERTIFY**, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

Page 2  
Case no. 13-06792-BKT  
Post confirmation modification of chapter 13 Plan

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 19<sup>th</sup> day of May, 2015.

/s/Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC 203614  
ATTORNEY FOR PETITIONERS  
PO BOX 193677  
SAN JUAN PR 00919-3677  
TEL 787-744-7699 FAX NO 787-746-5294  
EMAIL: [rfigueroa@rfclawpr.com](mailto:rfigueroa@rfclawpr.com)

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

ROMERO DE LEON, ERIC

Debtor(s)

Case No. 3:13-bk-6792

Chapter 13

**AMENDED CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee  directly  by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>5/19/2015</u>		<input type="checkbox"/> AMENDED PLAN DATED: _____ Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																			
<b>I. PAYMENT PLAN SCHEDULE</b> <table> <tr><td>\$ 300.00</td><td>x 57</td><td>= \$ 17,100.00</td></tr> <tr><td>\$ 540.00</td><td>x 3</td><td>= \$ 1,620.00</td></tr> <tr><td>\$ _____</td><td>x _____</td><td>= \$ _____</td></tr> <tr><td>\$ _____</td><td>x _____</td><td>= \$ _____</td></tr> <tr><td>\$ _____</td><td>x _____</td><td>= \$ _____</td></tr> <tr><td colspan="2">TOTAL: \$</td><td><b>18,720.00</b></td></tr> </table> <p>Additional Payments: \$ <b>18,000.00</b> to be paid as a LUMP SUM within <b>60 months</b> with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p><input checked="" type="checkbox"/> Other: <b>Claim listed in Schedule B</b></p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <b>36,720.00</b></p>		\$ 300.00	x 57	= \$ 17,100.00	\$ 540.00	x 3	= \$ 1,620.00	\$ _____	x _____	= \$ _____	\$ _____	x _____	= \$ _____	\$ _____	x _____	= \$ _____	TOTAL: \$		<b>18,720.00</b>	<b>II. DISBURSEMENT SCHEDULE</b> <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</p> <p>B. SECURED CLAIMS:</p> <p><input type="checkbox"/> Debtor represents no secured claims.</p> <p><input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> <li>1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <b>SCOTIABANK</b> Cr. _____ Cr. _____ # <b>Claim 4-1</b> # _____ # _____ \$ <b>3,110.11</b> \$ _____ \$ _____</li> <li>2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</li> <li>3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</li> <li>4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  <input type="checkbox"/> Other:  6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>SCOTIABANK</b></li> </ol> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> <li>1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</li> <li>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</li> </ol> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) Priority: \$11,424. Debtor assume lease agreement with Eduardo Diaz Vazquez; Pedro Clausell. Any proceeds of debtor cause of action listed on Schedule B received during the term of the Plan either by judgment or settlement shall be paid into the plan as a lump sum. The LV will be reassessed upon judgment or settlement. * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."</p> <p>Late filed claims filed by creditors will receive no distribution."Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.Debtor reserves the right to object claims after plan confirmation.</p>	
\$ 300.00	x 57	= \$ 17,100.00																			
\$ 540.00	x 3	= \$ 1,620.00																			
\$ _____	x _____	= \$ _____																			
\$ _____	x _____	= \$ _____																			
\$ _____	x _____	= \$ _____																			
TOTAL: \$		<b>18,720.00</b>																			
Signed:  Debtor		Joint Debtor																			

Attorney for Debtor R. Figueroa Carrasquillo Law Office

Phone: (787) 744-7699

**IN RE ROMERO DE LEON, ERIC**

Case No. 3:13-bk-6792

**Debtor(s)**

**AMENDED CHAPTER 13 PAYMENT PLAN**  
**Continuation Sheet - Page 1 of 1**

**Eduardo Diaz Vazquez  
Pedro Clausell**

Cr

#

8

Label Matrix for local noticing

0104-3

Case 13-06792-BKT13

District of Puerto Rico

Old San Juan

Tue May 19 10:18:12 AST 2015

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

(p) JEFFERSON CAPITAL SYSTEMS LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

SCOTIABANK DE PUERTO RICO

CARDONA JIMENEZ LAW OFFICE PSC

PO BOX 9023593

SAN JUAN, PR 00902-3593

AEE

PO BOX 363508

SAN JUAN PR 00936 3508

AFNI

ATT

PO BOX 3517

BLOOMINGTON, IL 61702-3517

ASOCIACION EMPLEADOS ELA

PO BOX 364508

SAN JUAN, PR 00936-4508

ASUME

MARIA V IRIZARRY CENTENO

PO BOX 11218

SAN JUAN, PR 00910-2318

ASUME

NILDA M RAMON APONTE

PO BOX 11218

SAN JUAN, PR 00910-2318

ASUME

PO BOX 11218

SAN JUAN, PR 00910-2318

AT&T

5407 ANDREWS HWY

MIDLAND, TX 79706-2851

AT&T

PO BOX 192830

SAN JUAN, PR 00919-2830

AT&T Mobility Puerto Rico, Inc

% AT&T Services, Inc

Karen Cavagnaro, Paralegal

One AT&T Way, Room 3A104

Bedminster, NJ 07921-2693

BANCO POPULAR DE PR

PO BOX 70100

SAN JUAN, PR 00936-8100

BANCO POPULAR DE PUERTO RICO

BANKRUPTCY DEPARTMENT

PO BOX 366818

SAN JUAN PR 00936-6818

CENTRO GOMAS VILLA DEL REY

VILLA DEL REY FF7 11 STREET

CAGUAS, PR 00727-6827

DORAL BANK

1451 AVE FD ROOSEVELT

SAN JUAN, PR 00920-2717

EMMA L ORTIZ TIRADO

HC 45 BOX 9721

CAYEY PUERTO RICO 00736-9606

ENHANCED RECOVERY CORPORATION

8014 BAYBERRY RD

JACKSONVILLE, FL 32256-7412

ENRIQUE J LEON MALAVE

C/O JUAN E MEDINA QUINTANA

VILLA GRILLASCA 2140 BLVD LUIS A FERRE

PONCE, PR 00717-0722

Eduardo Diaz Vazquez

Gurabo, PR 00778-0000

HOSPITAL MENONITA

BOX 373130

CAYEY, PR 00737

LCDA NILDA M RAMON APONTE

HACIENDA SAN JOSE 577 VIA GUAYABAL

CAGUAS, PR 00727-3064

LCDO JUAN E MEDINA QUINTANA

2140 LAS AMERICAS

PONCE, PR 00717-0750

MARIA V IRIZARRY CENTENO

BOX 692

AIBONITO, PR 00705-0692

ORIENTAL BANK (BBVA)

PO BOX 191017

SAN JUAN, PR 00919-1017

SCOTIABANK

PO BOX 362649

SAN JUAN, PR 00936-2649

ERIC ROMERO DE LEON

PO BOX 6951

CAGUAS, PR 00726-6951

JOSE RAMON CARRION MORALES

PO BOX 9023884

SAN JUAN, PR 00902-3884

MONSITA LECAROZ ARIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO  
PO BOX 186  
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
ST CLOUD, MN 56302-9617

(d) JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
ST CLOUD MN 56302

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) ASUME-EMMA L. ORTIZ TIRADO PO BOX 71316 S	(d) SCOTIABANK DE PUERTO RICO CARDONA-JIMENEZ LAW OFFICE, PSC P.O. BOX 9023593 SAN JUAN, PR 00902-3593	End of Label Matrix
		Mailable recipients 30
		Bypassed recipients 2
		Total 32